

UNITED STATES DISTRICT COURT

for the

District of _____

Division _____

FILED

2022 AUG -2 AM 10:38

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TNAntonio Dequan King
(FATHER)

Antonio Hurt

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

(Chief Police)
John Drake Metro Police Department
Glenn Funk District Attorney Office
Jill Fitchard Community Oversight Board
Smile-Direct Club

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

03-22 0573

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Antonio Dequan King and Antonio Hurt

Street Address

1018 North 7th Street

City and County

Nashville TN

State and Zip Code

37207

Telephone Number

615-400-6709

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name John DRAKE
Job or Title (if known) METRO-police Department Chief
Street Address 600 Murfreesboro pike
City and County Nashville TN
State and Zip Code 37210
Telephone Number 615-862-8600
E-mail Address (if known)

Defendant No. 2

Name Glenn Funk Davidson County District Atty
Job or Title (if known) District Attorney
Street Address 100 Woodland St
City and County Nashville
State and Zip Code TN 37213
Telephone Number 615 862-8043
E-mail Address (if known)

Defendant No. 3

Name Jill Fitchard (Community Oversight Board)
Job or Title (if known) Executive Director
Street Address Couldn't find Address
City and County Nashville TN
State and Zip Code
Telephone Number 615-880-1880
E-mail Address (if known)

Defendant No. 4

Name Smile-Direct Club
Job or Title (if known) Human Resource
Street Address 1530 Antioch Pike
City and County Antioch, TN
State and Zip Code 37013
Telephone Number 1800 688-4010
E-mail Address (if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Antonio Dequan King, Antonio Hurt is a citizen of the State of (name) 1 Father.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

BECAUSE OF THE EXCESSIVE FORCE AND OVERKILL
this is the REASON why I come to the conclusion of
fourteen million CAUSE you can't put a PRICE on life

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

SEE Attachment

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

SEE Attachment

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

Aug 2, 2022

Signature of Plaintiff

Printed Name of Plaintiff

Antonio Hurt
Antonio Dequan King (Father) Antonio Hurt

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

~~STATEMENT OF CLAIM~~
IV. STATE ment of Claim

DEAR

Judge I Am the father of Antonio Dequan King. He WAS the young man who took his gun to work And Shot his place of work up. I Am not justifying what he did At All.

This was his first mental illness breakdown. That WAS CAUSE from his place of work from being OVER WORKED, And being bullied by SUPERVISORS from talking to him A WEEK BEFORE his death by police.

On Aug 3, 2021 At smile-Direct in Antioch, TN. Has I watched the video of my sons shooting by metr-police the problem, is has my sons is walking AWAY from the building he had ALREADY disarmed his WEAPON. And has the police Approach him he has the clip in one ^{hand} the gun in the other hand. The police officer told him to drop the WEAPON.

But he is in a mental breakdown his mind is not going to comprehend any command in this state of minded. So I has he turn around to address the police the first officer shoots him eleven times. After he hits the ground so he no longer has his gun or clip. So with clip and the gun are far away from him. Has a officer is running toward my son another officer told him to hold up so the officer could keep shooting him. But the question is that my son deserve some help why keep shooting him if he was not threat once he hit the ground. It was over 17)seventeen bullet holes in his leg. What is so sickening to see a officer kneel down and ask him to give up. The first thing that told you he was mental ill is when they first shot him he said that shit don't hurt. And when the officer ~~asked~~^{asked} him to give up he said its just flesh wounds.

That is not normal for a person to do after taking all them bullets. Police need more training for mental illness and the laws on getting guns need to be more harder cause my sons mental attack happened at twenty-two after he got his permit for a gun and weapon. My question is why when I called Glenn Funk office and I asked, Why was it justify able homicide by police when he was shot so many times on the ground with no weapon in his hand. He should have been Apprend once he was not a threat anymore. Has I was waiting for Glenn Funk to close the case. So that the Oversight board could review it with me to see what policy they broke. But I don't know if he sent it. Because the Oversight board Jill Fitch heard quick answering my phone ^(CALLS IN) after the London E step shooting.

So has A person and tax payer
of the community. Why I cannot
get ANSWERS to the police shooting
of my son. But family of Landon
Estep the man who shot 36 times
but had the mental illness has
my son. I had to file this
complaint myself cause no lawyer
in town would take my case.
So I had to do it myself
for answers. This is one of the
hardest things to do is RE-live
this and watch the video of
his death.

Relief

THERE IS NOTHING OR NO AMOUNT OF MONEY TO REPLACE A LIFE OF A FAMILY MEMBER. MY SON'S DEATH BROKE MY FAMILY APART AND CAUSE MY NEPHEW TO COMMIT SUICIDE THREE WEEKS AFTER MY SON'S FUNERAL. WHICH WAS CAUSE BY THE VIDEO OF MY SON'S DEATH BY POLICE. AND MY ANOTHER TWO SONS HAD TO BE MOVED TO ANOTHER STATE TO START OVER. HAS A FATHER THIS PAIN WILL BE WITH ME FOREVER. I LOST EVERYTHING WHEN I LOST MY SON. SO WE ASK FOR \$ FOURTEEN MILLION FOR THE DISRESPECT FROM POLICE DEPARTMENT, GLEN FINK AND JILL FITCHEARD OF COMMUNITY OVERSIGHT BOARD THEY ACT LIKE MY SON HAS NO VALUE.